

Mail - Annamarie Trombetta - Outlook

Exhibit #1

Norb Novocin Deposition Full Production of Exhibit #4 –2 Page eBay email

Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Sat 10/29/2022 2:27 PM

To: ajd@hoganduff.com <ajd@hoganduff.com>; Adam Bialek <adam.bialek@wilsonelser.com>; Farmer, Jana S. <Jana.Farmer@wilsonelser.com>; Haimson, Nicole <Nicole.Haimson@wilsonelser.com>

8 attachments (13 MB)

Ebay Item Sold for 1972 Painting --EAI000058-EAI000059.pdf; EXHIBIT 4 Norb Novocin Deposition. JPG.JPG; Norb Novocin Deposition Page 74.jpg; Norb Novocin Deposition Page 75.jpg; Norb Novocin Deposition Page 76.jpg; Norb Novocin Deposition Page 77.jpg; Norb Novocin Deposition Page 78.jpg; Norb Novocin Deposition Page 79.jpg;

Mr. Duff and to all parties,

Attached is are pages 74 to 79 of the September 21, 2022 Novocin Deposition. WorthPoint attorneys requested identified and called for the production of the two page December 1, 2012 email sale for the 1972 Original Oil Painting titled Man With Red Umbrella.

Production of this two page document labeled Exhibit 4 and also EAI00058 and EAI00059 is requested immediately . Failure to produce these two documents will be noted to the Court in a letter on October 31, 2022.

Submitted October 29, 2022

Annamarie Trombetta

Email
to A. Poll

Exhibit #1

Exhibit #2
Page 1

Page 74

1 N. NOVOCIN

2 A. I couldn't find it. I e-mailed
3 it to myself.

4 MS. FARMER: To the extent not
5 already produced, we will call for
6 the production of the copy of the
7 listing that your son was able to
8 find. We will make a request of Mr.
9 Duff.

10 Q. Mr. Novocin, this document,
11 Defendant's Exhibit 4 that we are looking
12 at, that appears to be an e-mail address to
13 you, correct?

14 A. Yes.

15 Q. It appears to be from Ebay,
16 EAI?

17 A. Correct.

18 Q. Is that the typical e-mail that
19 you would receive from Ebay when one of
20 your listings would sell?

21 A. No. Let me -- the one further
22 down would be, yes, where it says,
23 "Congratulations, your item sold", all of
24 that would be a typical one that we had
25 from Ebay, yes.

Exhibit # 2
Page 2

Page 75

1 N. NOVOCIN

2 Q. I take it the top e-mail is for
3 the earlier notification, correct?

4 A. Correct.

5 Q. Did you ask Ebay to be sent to
6 you that sales notification from 2012?

7 A. No.

8 Q. How did you happen to get the
9 January 10, 2017 e-mail?

10 A. We would have gone through our
11 old e-mails and got a copy of it from other
12 old e-mails. We don't throw e-mails away.

13 Q. When it says Ebay, EAI, does
14 that indicate it came from Ebay or some
15 other company?

16 A. It came from us, Estate
17 Auctions Incorporated.

18 Q. This is initially you
19 forwarding your old e-mail to yourself?

20 A. Correct.

21 Q. To your knowledge, does your
22 e-mail server, if they are familiar with
23 somebody's e-mail address, do they brief it
24 so the A sign is not visible?

25 A. Yes.

Exhibit # 3
Page 3

Page 76

1 N. NOVOCIN

2 Q. It would make sense that your
3 e-mail system knows your other e-mail
4 addresses, correct?

5 A. Correct.

6 Q. Now, the e-mail below it,
7 December 1, 2012, it is from Ebay.com,
8 correct?

9 A. Correct.

10 Q. You received that e-mail from
11 Ebay at Ebay@Novocin.com, correct?

12 A. Correct.

13 Q. Was that the e-mail that you
14 personally used, somebody else in your
15 company or something else?

16 A. One of the company e-mails
17 yeah.

18 Q. Who has access to these
19 e-mails?

20 A. The list of people that I gave
21 you earlier all have access to that e-mail.

22 Q. Are you by any chance still in
23 possession of the original file for this
24 e-mail? Not the pdf, but the actual
25 e-mail.

Exhibit #2

Page 77

Page 4

1 N. NOVOCIN

2 A. I don't know. I would have to
3 go and check. I don't know if we still
4 have that, if Ebay@Novocin.com goes back
5 that far.

6 Q. Do you see towards the bottom
7 of this document, there appears to be a
8 section that's a little bit cut off. Do
9 you see that?

10 A. Yes.

11 Q. I'm going to ask if you can go
12 back and check if the original e-mail file,
13 if you still have it, might have this
14 information without being cut off. If so,
15 I would ask of you to please provide us
16 with a copy that's not cut off. Okay?

17 A. That's okay. I'm pretty sure
18 we have a copy. In fact, this one here
19 might be a copy of it. When you create
20 pdfs, sometimes pdf cut it off. I can get
21 that.

22 MR. DUFF: What's the part
23 that's cut off?

24 (Whereupon, an off the record
25 discussion was held).

*Exhibit #2
Page 5*

Page 78

1 N. NOVOCIN

2 Q. Mr. Novocin, does the domain
3 Ebay@Novocin.com still exist?

4 A. Yes.

5 Q. Was there a server associated
6 with this domain?

7 A. Multiple.

8 Q. Do these servers still exist?

9 A. A lot of the servers that we
10 had to switch, we lost all the previous
11 photos on. We switched it to a different
12 server while keeping Novocin, but we didn't
13 switch over the millions of photos that
14 were on it.

15 Q. When was Ebay@Novocin.com
16 created?

17 A. A long time ago. I don't know.

18 Q. Was it before top of the 2008
19 page, to your knowledge?

20 A. Yes, it was before 2008, yes.

21 Q. This document, Defendant's
22 Exhibit 4, does it indicate to you the
23 price for which the painting Man With A Red
24 Umbrella was sold?

25 A. Well, it's cut off, but yeah,

Exhibit # 2
Page 6

Page 79

1 N. NOVOCIN

2 it says, "Sale price, 181.5". I'm pretty
3 sure it's 181.50.

4 Q. It indicates the buyer is N[redacted]
5 something?

6 A. Yes.

7 Q. Does it indicate that the
8 person who bought this painting resides in
9 Reno?

10 A. [redacted], yes.

11 Q. To your knowledge, is that
12 true, the purchaser was named Nina and she
13 resides in Reno, Nevada?

14 A. Yes.

15 Q. Is that the person that you
16 spoke to to try to get the photos of the
17 painting?

18 A. Yes.

19 Q. When you were composing the
20 listing for this painting, did you call
21 Worthpoint to discuss that with them?

22 A. I don't think I was a member of
23 Worthpoint at that time.

24 Q. Did Worthpoint have any input
25 whatsoever to what you put into the listing

Wednesday, April 27, 2022 at 21:30:09 Eastern Daylight Time

Subject: Fwd: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (330833102936)

Date: Tuesday, January 10, 2017 at 5:28:43 PM Eastern Standard Time

From: eBay EAI

To: Norb Novocin, marie novocin

Ebay A!
Page 1

----- Forwarded message -----

From: eBay <ebay@ebay.com>

Date: Sat, Dec 1, 2012 at 9:54 PM

Subject: Your eBay item sold! 1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (330833102936)

To: ebay@novocin.com

eBay

eBay sent this message to Norb & Marie Novocin (estateauctionsinc).
Your registered name is included to show this message originated from eBay. [Learn more.](#)

Congratulations, your item sold!

Dear estateauctionsinc,

You did it! Your item sold. Please ship this item to the buyer after your buyer pays. As soon as your buyer pays, print

Complete one of the following:

- [Print a shipping label](#) Avoid a trip to the post office, print and pay for your label at home. Printing shipping labels at home can reduce pricing on some shipping services, and when you print shipping labels on eBay, your tracking information is automatically included.
- [Provide shipping and tracking information](#). When you upload tracking information to eBay, we'll send it to your buyer so they know the item is on its way. This will save you time, and may result in fewer questions from buyers and higher detailed seller ratings.
- [Mark your item as shipped in My eBay](#). Do this, and we'll let your buyer know the item is on its way. This will result in fewer questions from buyers and higher detailed seller ratings.

You should always [leave feedback](#) for your buyer to encourage them to buy from you again.

[1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz](#)

[1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz](#)

Sale price: \$181.
Quantity sold: 1
Sale date: Dec-0
Buyer: nina c
9naclc
[conta

Buyer's shipping address:nina c
14215
reno, I

[Sell another Item](#) | [Send invoice](#)

Select your email preferences

- Want to reduce your inbox email volume? [Receive this email as a daily digest](#). For other email digest options, go to [Notification Preferences](#) in My eBay.
- Don't want to receive this email? [Unsubscribe from this email](#).

Exhibit#3

Email reference id: [#45d0df16f2ea40759d3656f834970b06#]

Please don't remove this number. eBay customer support may ask you for this number, if you should need assistance.

[Learn More](#) to protect yourself from spoof (fake) emails.

eBay sent this email to you at ebay@novocin.com about your account registered on www.ebay.com.

eBay sends these emails based on the preferences you set for your account. To unsubscribe from this email, change your [communication preferences](#). Please note that it may take up to 10 days to process your request. Visit our [Privacy Policy](#) and [User Agreement](#) if you have any questions.

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Ebay
Page 2



Annamarie Trombetta <atrombettaart@gmail.com>

Request for copy Docket 282 and Plaintiff's response due on September 22, 2022

Annamarie Trombetta <atrombettaart@gmail.com>

To: Anderson Duff <ajd@hoganduff.com>, "Farmer, Jana S." <jana.farmer@wilsonelser.com>, "Bialek, Adam" <Adam.Bialek@wilsonelser.com>, "Haimson, Nicole" <nico.haimson@wilsonelser.com>

Page 10 of 12
Filed 11/10/22

To Mr. Duff,

Plaintiff is requesting that all my discovery responses set forth in my September 19th letter in Doc. 180 to the Court be answered in completion.

I am requesting a copy of Docket 282 due to your failure to send Plaintiff the letter addressed to Judge Cave. Kindly send your September 22, 2022 letter to Plaintiff as soon as possible.

Submitted September 23, 2022 at 6 a.m.
Annamarie Trombetta

Fri, Sep 23, 2022 at 5:56 AM

E. Trombetta
Page 1



Annamarie Trombetta <atrombettaart@gmail.com>

Request for copy Docket 282 and Plaintiff's response due on September 22, 2022

Annamarie Trombetta <atrombettaart@gmail.com>
Aj: Anderson Duff <ajd@hoganduff.com>, "Farmer, Jana S." <jana.farmer@wilsonelser.com>, "Bialek, Adam" <Adam.Bialek@wilsonelser.com>, "Haimson, Nicole" <nicoles.haimson@wilsonelser.com>

Fri, Sep 23, 2022 at 10:20 AM

"Haimson, Nicole"

To Mr. Duff,

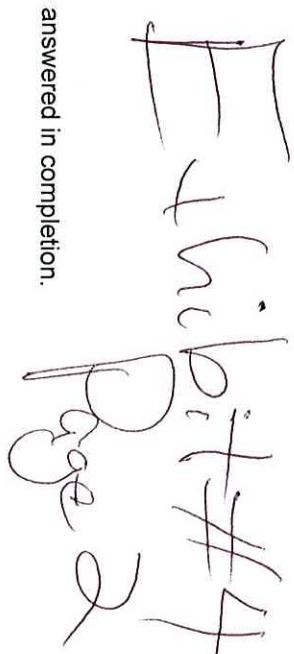
Plaintiff is requesting that all my discovery responses set forth in my September 19th letter in Doc. 280 to the Court be answered in completion.

I am requesting a copy of Docket 282 due to your failure to send Plaintiff the letter that is addressed to Judge Cave. Kindly send your September 22, 2022 letter to Plaintiff as soon as possible.

Submitted September 23, 2022 at 10:20 a.m.

Annamarie Trombetta

[Quoted text hidden]


Annamarie Trombetta
Page 2

Exhibit#5

Gmail - Follow Up of Third Subpoena



Annamarie Trombetta <atrombettaart@gmail.com>

Follow Up of Third Subpoena

Nicole.Lesniakaccacia@aol.com>
To: Annamarie Trombetta <atrombettaart@gmail.com>

Mon, Nov 7, 2022 at 3:14 PM

I have no written proof of payment for man with red umbrella
Measurements (I bought a custom frame for the painting)
Length with frame 50 and 3/4 inches
Width with frame 19 and 5/8 inches
Length to the best of my ability without frame 48 and 1/4 inches
Width without frame 17 and 1/8 inches

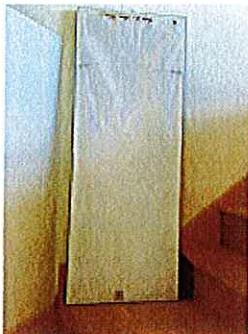
Sent from my iPad

On Nov 6, 2022, at 8:51 AM, Annamarie Trombetta <atrombettaart@gmail.com> wrote:

[Quoted text hidden]

From
Boyer of
1972
Oil Man With
Red Umbrella

4 attachments



Back of Painting.HEIC
518K

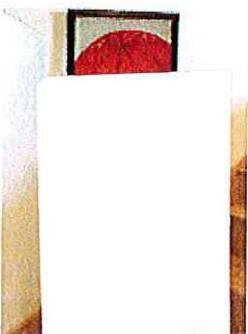


Image Man With Red Umbrella IMG_0246.HEIC
620K